

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

MICHAEL BOSH, AS SPECIAL  
ADMINISTRATOR FOR THE  
ESTATE OF DANIEL BOSH

Plaintiff,

v.

CHEROKEE COUNTY  
GOVERNMENTAL BUILDING  
AUTHORITY;

GORDON CHRONISTER; and

T. J. GIRDNER,

Defendants.

Case No.: CIV-2011-376-JHP

**DEFENDANTS' MOTION TO FILE EXHIBITS UNDER SEAL**

**To the Clerk of this Court and all parties of record:**

Defendants Gordon Chronister and T.J. Girdner, submit the following Motion to File Exhibits Under Seal.

1. On January 26, 2012, the Court issued a Protective Order in this case permitting parties to designate records as "confidential". [See Dkt. #33].

2. Pursuant to that Order, the parties have designated material as confidential that Defendants anticipate relying upon in support of their response to Plaintiff's second motion for sanctions [Dkt. #219] relating to allegations of spoliation. Specifically, Defendants wish to utilize their respective OSBI audio interviews which Plaintiff, too, filed under seal.

3. Accordingly, Defendant respectfully requests the Court issue an Order permitting him to file exhibits under seal designated as confidential.

WHEREFORE, all premises considered, Defendants respectfully request the Court grant Defendants' Motion to file exhibits under seal. A proposed order is submitted contemporaneous with this motion.

Respectfully submitted,

s/ Daniel J. Card

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*Gordon Chronister, and*

*T.J. Girdner*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19<sup>th</sup> day of May, 2014, I transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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